

Revised

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AGROS SHIPPING CO. LTD.,

Plaintiff,

v.

CEYLON PETROLEUM CORPORATION

Defendant.

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CIVIL ACTION NO. 4 :19-CV-1364

**IN ADMIRALTY**

## DECLARATION OF THEO PILAVAKIS

I, Theo Pilavakis, pursuant to 28 U.S.C. §1746 hereby declare and say the following under penalty of perjury:

1. I am a representative of Plaintiff AGROS SHIPPING CO. LTD (hereinafter "Plaintiff") and authorized to act on Plaintiff's behalf.

2. I am an individual of sound mind and body, and have never been convicted of a crime of moral turpitude.

3. This declaration is respectfully submitted in support of Plaintiff's application for maritime attachment and garnishment of property of Defendant CEYLON PETROLEUM CORPORATION (hereinafter "Defendant").

4. I make this declaration based on my personal knowledge; official company records; my own investigation; discussion with Plaintiff; and other information available to the public at large.

5. I have read the Ex Parte Motion for and Order Directing Issuance of Writ of Maritime Attachment and Garnishment Pursuant to Supplemental Admiralty Rule B and for

Expedited Consideration prepared by Plaintiff's attorneys, CHALOS & CO, P.C., know the contents thereof, and hereby declare that the allegations are true and accurate.

6. Plaintiff has conducted an investigation and made maritime industry inquiries of Defendant's regular business activities due to the large outstanding debt caused by Defendant's breach of the charter party agreement.

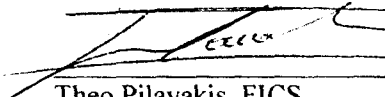
7. Those investigations and industry inquiries have revealed that garnishees British Petroleum (hereinafter "BP") and/or Gulf Petrochem and GP Global WOS Ltd. (hereinafter collectively "Gulf Petrochem") have or likely to have outstanding debts due and owing to Defendant based on regular business activities by and between these companies, to wit, the transport and trade of petroleum and gas products worldwide. *See Spreadsheet attached hereto as Exhibit 1.*

8. Garnishees BP and Gulf Petrochem both have offices located within the Southern District of Texas in Houston, Texas.

9. I hereby declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and accurate to the best of my knowledge.

Respectfully Submitted,

Dated: April 17, 2019

  
Theo Pilavakis, FICS  
Managing Director  
World Tankers (UK) Ltd.  
(As Agents)

*Authorized Representative of Plaintiff  
Agros Shipping Co. Ltd.*



# EXHIBIT 1

2019

| CPC REF. NO | ETA / LAYCAN          | VESSEL           | PRODUCT(S)                                     | CARGO QUANTIT                         | BERTH    | CHARTERER / SUPPLIER | LOAD PORT    | TERMINAL |
|-------------|-----------------------|------------------|------------------------------------------------|---------------------------------------|----------|----------------------|--------------|----------|
| BK/14/2019  | PRESENTLY DISCHARGING | TEATRALNY BRIDGE | GAS OIL 0.05%<br>GASOLINE 92<br>GASOLINE 95    | 16,686 MTS<br>13,417 MTS<br>7738 MTS  | DTB/SPBM | GULF PRTROCHEM       | SINGAPORE    | VOPAK    |
| BK/16/2019  | PRESENTLY DISCHARGING | SEAMERIDIAN      | GAS OIL 0.001%<br>GAS OIL 0.05%<br>GASOLINE 92 | 7,063 MTS<br>15,125 MTS<br>16,000 MTS | DTB/SPBM | GULF PRTROCHEM       | SINGAPORE    | HORIZON  |
| BK/17/2019  | 09/03/2019            | RIBE MAERSK      | HSFO                                           | 25,000 MTS                            | DTB      | GULF PRTROCHEM       | FUJAIRAH     | OTB 6    |
| CR/04/2019  | AWAITING BERTHING     | ETC RAMSIS       | CRUDE OIL                                      | 95,797 MT                             | SPBM     | ITOUCHU              | FUJAIRAH     | BP       |
| BK/18/2019  | 12-13/03/2019         | MERAPI           | GAS OIL 0.05%                                  | 40,000 MTS                            |          | SWISS SG             | SIKKA, INDIA | RELIENCE |
| BK/19/2019  | 20-21/03/2019         | TBN              | GASOLINE 92                                    | 37,500 MTS                            |          |                      |              |          |
| BK/20/2019  | 24-25/03/2019         | TBN              | GAS OIL 0.05%                                  | 40,000 MTS                            | DTB/SPBM |                      |              |          |
| CR/05/2019  | 26-27/03/2019         | TBN              | CRUDE OIL                                      | 90,000 MTS                            | SPBM     | ENOC                 | FUJAIRAH     | BP       |
| BK/22/2019  | 30-31/03/2019         | TBN              | GAS OIL 0.05%<br>GASOLINE 92<br>GASOLINE 95    | 11,000 MTS<br>20,300 MTS<br>7,000 MTS | DTB/SPBM |                      |              |          |

2019

| CPC REF. NO | ETA / LAYCAN          | VESSEL        | PRODUCT(S)                                    | CARGO QUANTITY                                    | BERTH       | CHARTERER / SUPPLIER | LOAD PORT | TERMINAL |
|-------------|-----------------------|---------------|-----------------------------------------------|---------------------------------------------------|-------------|----------------------|-----------|----------|
| BK/25/2019  | PRESENTLY DISCHARGING | POLITISA LADY | GAS OIL 0.05%\$<br>JET A1                     | 26,956.137 MTS<br>14,219.217 MTS                  | DTB/SPBM 02 | GULF PETROCHEM       | AL-JUBAIL | SHELL    |
| BK/27/2019  | PRESENTLY DISCHARGING | TORM ASLAUG   | GAS OIL 0.05%\$<br>GASOLINE 92<br>GASOLINE 95 | 12,683.098 MTS<br>17,797.330 MTS<br>6,626.696 MTS | DTB/SPBM 02 | VITOL                | SINGAPORE | HORIZON  |
| BK/28/2019  | 21-22/04/2019         | SAPSAN        | GAS OIL 0.05%\$<br>GASOLINE 92                | 20,000 MTS<br>20,000 MTS                          | DTB/SPBM 02 | VITOL                | SINGAPORE | TBN      |
| BK/29/2019  | 24-25/04/2019         | FAVOLA        | FUEL OIL (H/S)                                | 20,000 MTS                                        | DTB         | GULF PETROCHEM       | FUJAIRAH  | FOT 201  |
| BK/30/2019  | 29-30/04/2019         | MERAPI        | GAS OIL 0.05%\$<br>GASOLINE 92                | 24,300 MTS<br>16,000 MTS                          | DTB/SPBM 02 | GULF PETROCHEM       | SINGAPORE | HORIZON  |
| BK/31/2019  | 29-30/04/2019         | TORM AGNES    | GAS OIL 0.05%\$<br>JET A1                     | 23,000 MTS<br>15,000 MTS                          | DTB/SPBM 02 | GULF PETROCHEM       | FUJAIRAH  | TBN      |
| CR/07/2019  | 28-29/04/2019         | TBN           | CRUDE OIL                                     | 90,000 MTS                                        | SPBM 01     | VITOL                | FUJAIRAH  | TOTAL    |
| BK/32/2019  | 05-06/05/2019         | TORM ASTRID   | GAS OIL 0.05%\$<br>GASOLINE 92<br>GASOLINE 95 | 11,000 MTS<br>20,300 MTS<br>7,000 MTS             | DTB/SPBM 02 | VITOL                | SINGAPORE | TBN      |
| BK/34/2019  | 04-05/05/2019         | TBN           | FUEL OIL (H/S)                                | 20,000 MTS                                        | DTB         | GULF PETROCHEM       | FUJAIRAH  | VTT      |
| BK/33/2019  | 06-07/05/2019         | TBN           | GAS OIL 0.05%\$<br>JET A1                     | 25,000 MTS<br>15,000 MTS                          | DTB/SPBM 02 | TBN                  | TBN       | TBN      |
| CR/08/2019  | 15-16/05/2019         | OLYMPIC SEA   | CRUDE OIL                                     | 90,000 MTS                                        | SPBM 01     | ITOCHU               | FUJAIRAH  | TOTAL    |